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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
 )  
Reexamination of Comparative Standards ) MM Docket No. 95-31  
for Noncommercial Educational Applicants )

To: The Commission

JOINT MOTION OF NATIONAL PUBLIC RADIO, INC.,  
ASSOCIATION OF AMERICA'S PUBLIC TELEVISION STATIONS AND  
THE CORPORATION FOR PUBLIC BROADCASTING FOR AN EXTENSION  
OF TIME FOR COMMENT AND REPLY COMMENT DEADLINES

National Public Radio, Inc. ("NPR"), the Association of America's Public  
Television Stations ("APTS") and the Corporation for Public Broadcasting ("CPB")  
hereby request the Commission to extend the Comment period established in the above-  
captioned proceeding by forty-five (45) days, to January 28, 1999, and to extend the  
Reply Comment period to March 15, 1999, to provide for a forty-five (45) day reply  
period.

NPR is a non-profit membership organization of approximately 600  
noncommercial educational radio stations nationwide. APTS is a non-profit membership  
organization that represents the public television stations before Congress and the FCC.  
CPB is the private, non-profit corporation authorized by the Public Broadcast Act of 1967  
to facilitate and promote a national system of public telecommunications.

The Commission's *Further Notice of Proposed Rulemaking* ("Notice") was  
published in the Federal Register on October 30, 1998. The comment and reply comment

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deadline dates are set for December 14, 1998 and January 4, 1998, respectively. For the reasons stated below, NPR, APTS and CPB believe there is good cause for the FCC to provide a brief extension of these deadlines.

In the Notice, the Commission proposes dramatic changes to the methods by which noncommercial educational television and radio broadcasters obtain new licenses and secure major modifications of their existing licenses. The Commission has proposed a wholly new process – either a lottery or a point system – and sought comment on a range of potential criteria to determine how noncommercial broadcast licenses will be allocated among competing applicants for the foreseeable future. In addition, the Commission has proposed a number of novel approaches for deciding among mutually-exclusive applications by noncommercial and commercial applicants for non-reserved spectrum.

NPR, APTS and CPB require additional time to engage in a thorough evaluation of the Commission's detailed proposals and their likely impact on public broadcasters, to consult with the hundreds of potentially affected public television and public radio licensees, and to prepare comments based on this evaluation and consultation process. NPR, APTS and CPB already have undertaken significant evaluation and assessment efforts. We have advised member stations about the proposals and received member station input. In spite of this significant work, it is clear that more time is needed to prepare comments.

In view of the complexity of the issues and the significant effort and coordination required, a 45-day extension of the comment period will result in a more meaningful and comprehensive record and, accordingly, will best serve the public interest. An extension

of 45 days, rather than a shorter time period, is necessary because of the upcoming holiday season, when many public broadcasters, particularly university-owned stations, operate with minimal staffing.

For many of the same reasons, NPR, APTS and CPB request an extension of the Reply Comment deadline until March 15, 1999, to afford parties 45 days to prepare Reply Comments. A proceeding of this significance will draw a high volume of detailed comments. A 45-day period, rather than a 20-day period, will enable the parties to better digest and respond to these comments and will provide the Commission with a more comprehensive record.<sup>1</sup>

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<sup>1</sup> See 1998 Biennial Review – Streamlining of Radio Technical Rules Parts 73 and 74 of the Commission's Rules, Order, DA 98-2302 (November 13, 1998) (granting an extension request to provide 45 days to respond to voluminous comments in complex proceeding).

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November 30, 1998

Respectfully Submitted,

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## CERTIFICATE OF SERVICE


I, Michelle M. Shanahan, Assistant General Counsel of National Public Radio, Inc., hereby certify that a copy of the foregoing "Joint Motion of National Public Radio, Inc., Association of America's Public Television Stations and The Corporation for Public Broadcasting for An Extension of Time for Comment and Reply Comment Deadlines" was delivered by hand on this 30<sup>th</sup> day of November 1998, to the following:

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